

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No. 1:19-cv-00983-LCB-JLW

AMY HILL, DOMINIQUE
MORRISON, SARA HAWES,
CASSANDRA CHIARALUCE, and
JONATHAN FONTAINE individually,
and on behalf of all others similarly
situated,

Plaintiffs,

v.

AQ TEXTILES LLC and CREATIVE
TEXTILE MILLS PVT. LTD.,

Defendants.

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR
CLASS CERTIFICATION**

Pursuant to Local Civil Rules 6.1(a), 7.3(k), 23.1(b), and Federal Rule of Civil Procedure section 6(b)(1)(B), Plaintiffs Amy Hill, Dominique Morrison, Sara Hawes, Cassandra Chiaraluce, and Jonathan Fontaine individually and on behalf of all others similarly situated, ("Plaintiffs"), by their respective counsel, respectfully request an extension to file their Motion for Class Certification until a new deadline providing sufficient time for the parties to conduct class certification discovery can be set after the Court rules on the pending Motion to Dismiss and issues a LR 16.1 Initial Pretrial Order. In support of this Motion, Plaintiffs submit the accompanying Memorandum of Law. Plaintiffs have conferred with Defendants, and Defendants will respond upon review of the present motion and memorandum.

Respectfully submitted this the 23rd day of July, 2020.

/s/ Scott C. Harris

Scott C. Harris

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Attorney for Plaintiffs

CERTIFICATE OF CONSULTATION

I hereby certify pursuant to Local Rule 6.1 that on Plaintiffs' counsel consulted via phone with attorneys for Defendants. During the call, counsel for Defendants asserted that they would respond upon receipt and review of the motion.

/s/ Scott C. Harris
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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2020, I electronically filed the foregoing motion with the Clerk of Court using the CM/ECF system which will send notification of the filing to all parties of record.

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